

1 IRELL & MANELLA LLP  
2 Morgan Chu (SBN 70446)  
3 Benjamin W. Hattenbach (SBN 186455)  
Michael D. Harbour (SBN 298185)  
1800 Avenue of the Stars, Suite 900  
Los Angeles, California 90067-4276  
Telephone: (310) 277-1010  
Facsimile: (310) 203-7199  
Email: mchu@irell.com  
Email: bhattenbach@irell.com  
Email: mharbour@irell.com

7 A. Matthew Ashley (SBN 198235)  
Olivia Weber (SBN 319918)  
8 840 Newport Center Drive, Suite 400  
Newport Beach, California 92660-6324  
9 Telephone: (949) 760-0991  
Facsimile: (949) 760-5200  
10 Email: mashley@irell.com  
Email: oweber@irell.com

11 *Counsel for Defendants*  
12 FORTRESS INVESTMENT GROUP LLC,  
FORTRESS CREDIT CO. LLC,  
13 VLSI TECHNOLOGY LLC

14 **UNITED STATES DISTRICT COURT**  
15 **NORTHERN DISTRICT OF CALIFORNIA**

16  
17 INTEL CORPORATION and APPLE INC.,

18 Plaintiffs,

19 v.

20 FORTRESS INVESTMENT GROUP LLC,  
FORTRESS CREDIT CO. LLC, UNILOC  
21 2017 LLC, UNILOC USA, INC., UNILOC  
LUXEMBOURG S.A.R.L., VLSI  
22 TECHNOLOGY LLC, INVIT SPE LLC,  
INVENTERGY GLOBAL, INC., DSS  
23 TECHNOLOGY MANAGEMENT, INC., IXI  
IP, LLC, and SEVEN NETWORKS, LLC,

24 Defendants.

25 Case No. 3:19-cv-07651-EMC

26  
27  
28 **DECLARATION OF A. MATTHEW  
ASHLEY IN SUPPORT OF  
STIPULATION AND [PROPOSED]  
ORDER TO EXTEND DEADLINES TO  
RESPOND TO THE COMPLAINT AND  
SET MOTIONS TO DISMISS, STRIKE  
AND/OR STAY THE ACTION BRIEFING  
SCHEDULE**

I, A. Matthew Ashley, declare as follows:

2       1. I am an attorney at law, admitted to practice in the United States District Court,  
3 Northern District of California, and I am a partner with the law firm of Irell & Manella LLP,  
4 counsel for Fortress Investment Group LLC, Fortress Credit Co. LLC, and VLSI Technology LLC  
5 in this matter. I have personal knowledge of each fact stated in this declaration and, if called as a  
6 witness, I could and would competently and truthfully testify thereto.

7       2. Plaintiffs Intel Corporation and Apple Inc. served summonses on each of the  
8 defendants Fortress Investment Group LLC, Fortress Credit Co. LLC, and VLSI Technology LLC  
9 on November 25, 2019, and I have been informed that defendants Uniloc 2017 LLC, Inventergy  
10 Global, Inc., INVT SPE LLC, DSS Technology Management, Inc., IXI IP, LLC, and Seven  
11 Networks, LLC (collectively, “Defendants”) received summonses on November 25, 2019.

12       3. The parties have met and conferred over a stipulation to extend Defendants'  
13 deadlines to respond to the Complaint.

14       4. Defendants anticipate that they may respond to the Complaint by way of motions to  
15 dismiss, strike and/or stay the action, and the parties have agreed on a briefing schedule that will  
16 govern such motion practice, subject to Court approval.

17       5. Neither the parties' proposed extension of Defendants' deadlines to respond to the  
18 Complaint nor the proposed briefing schedule will change or alter the date of any event or  
19 deadline already fixed by Court order.

20 I declare under penalty of perjury under the laws of the United States of America that the  
21 foregoing is true and correct.

22 Executed on December 12, 2019 at Newport Beach, California.

By: /s/ A. Matthew Ashley  
A. Matthew Ashley